

### **REMARKS/ARGUMENTS**

By this amendment, claims 1, 3-5 and 16 are amended. Support can be found in paragraphs [0020]-[0023], [0031], and [0033] of the present specification and the deleted claims. Claims 11-15 and 17-21 are cancelled without prejudice. Paragraph [0033] was amended to correct a typographical error. Favorable reconsideration is respectfully requested for currently pending claims.

Claim Rejections 35 USC § 102. The Office Action rejected claims 1-21 under 35 U.S.C. 102(e) as being anticipated by Ameen et al. (US 6,635,569). Claims 1, 2, 4, 7-9, and 13-19 were rejected under Section 102(b) as being anticipated by Gupta et al. (US 5,824,375). Applicants respectfully submit that claims 1-10 and 16 are not anticipated by Ameen et al. or Gupta et al. for the following reasons.

Ameen et al. fail to disclose or suggest any step of introducing a nonreactive gas into said deposition chamber for diluting contaminants in said deposition chamber so as to stabilize a condition inside said deposition chamber. Ameen's step of introducing the gases Ar, H<sub>2</sub>, and N<sub>2</sub> into the reactor was cited by the examiner as equivalent to the step recited in claim 1 of the present application. In fact, the Ameen's introduced gases are used with different functions. The H<sub>2</sub>/Ar plasma is introduced into the reactor before the reactant TiCl<sub>4</sub>, while the purpose is that direct exposure of hot metallic surfaces to the TiCl<sub>4</sub> gas is prevented, or a tendency for metal chlorides to form on the hot metallic surfaces may have a detrimental effect on process performance (col. 2, lines 23-26 and col. 5, lines 24-29). It is apparent that the step of introducing H<sub>2</sub>/Ar plasma is not used for diluting the contaminants. Moreover, the gases H<sub>2</sub> and N<sub>2</sub> introduced into the reactor after the pre-coating step are utilized as reducing species to be reacted with the contaminants to form passivated species (col. 10, lines 57-67). The introduced gases participate in the passivating reactions. Hence, neither the cited plasma clean step 34 nor the stabilization step 50 can be considered equivalent to the diluting step of the present invention.

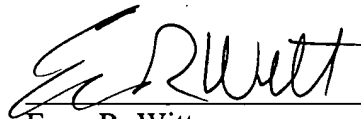
Gupta also fails to disclose or suggest any step of introducing a nonreactive gas into said deposition chamber for diluting contaminants in said deposition chamber after said pre-deposition procedure so as to stabilize a condition inside said deposition chamber. Gupta's desorption step 205 of introducing an inert gas and striking a plasma in the chamber will remove

the sorbed contaminants before the formation of the season layer made of silicon oxide onto the chamber components exposed to the process environment (col. 8, lines 45-57). Hence, Gupta's desorption step 205 can not stabilize the conditions in the reactor which change due to the pre-deposition step for forming the season layer. Accordingly, the cited desorption step 205 cannot be considered equivalent to the diluting step of the present invention.

In view of the foregoing, applicants submit that claims 1-10 and 16 are not anticipated by Ameen et al. and Gupta. Withdrawal of the rejections is respectfully requested.

Applicants respectfully requests that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,



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